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LAWLER, METZGER & MILKMAN, LLC

1909 K STREET, NW SUITE 820 WASHINGTON, D.C. 20006

CHARLES W. LOGAN DIRECT (202) 777-7724

PHONE (202) 777-7700 FACSIMILE (202) 777-7763

November 8, 2000

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FEBERAL COMMARKISATIONS COMMISSION
CORRES OF THE SECRETARY

By Hand

Magalie Roman Salas, Secretary Federal Communications Commission 445 Twelfth Street, S.W. 12th Street Lobby, TW-A-325 Washington, D.C. 20554

Re:

Request for Extension of Time to File Report on E911 Phase II Implementation Plan KNLF236 -- GTE Wireless Cincinnati LLC CC Docket No. 94-102

Dear Ms. Salas:

GTE Wireless Cincinnati LLC, the licensee of PCS station KNLF236, hereby requests an extension of the deadline to file its E911 Phase II implementation report for this station. This report is currently due November 9, 2000. GTE Wireless Cincinnati LLC, which has temporarily been placed into a divestiture trust, requests that this deadline be extended until 45 days after it has been transferred to a third party from the trust.

As a condition of approval of the merger of Bell Atlantic Corporation ("Bell Atlantic") and GTE Corporation ("GTE"), the Commission and the U.S. Department of Justice ("DOJ") required the divestiture of certain cellular and PCS licenses. To afford themselves sufficient time to divest the licenses properly and so as not to delay closing of the merger, Bell Atlantic and GTE, with Vodafone AirTouch Plc and Joseph J. Simons, Esq., as Trustee ("Trustee"), sought consent from the Commission and the DOJ to transfer control of or assign such licenses to a divestiture trust administered by the Trustee. On June 26, 2000, the Commission issued an Order granting this consent. In re Applications of GTE Corporation, Vodafone AirTouch PLC, and Bell Atlantic Corporation For Consent to Transfer Control of or Assign Properties to Divestiture Trust and For Temporary Waiver of the CMRS Spectrum Cap Rule, Order, DA 00-1414 (June 26, 2000) ("Order").

Pursuant to the Commission's Order, control of GTE Wireless Cincinnati LLC, licensee of KNLF236, was transferred to the Trustee on August 29, 2000. The Order requires the Trustee to divest this PCS license to a third party within 180 days of being placed in trust. On August 28, 2000, the Commission granted its consent to transfer control of KNLF236 to BGV License Company, LLC. *See Public Notice*, DA 00-1973 (released Aug. 28, 2000).

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GTE Wireless Cincinnati LLC will therefore be within the control of the Trustee for only a temporary period of time, and will be transferred to a third party well before the deadlines established by the Commission for wireless carriers to deploy E911 Phase II systems. The Trustee consequently requests that the Commissions extend the deadline for GTE Wireless Cincinnati LLC to file its E911 Phase II implementation report until 45 days after control over KNLF236 has been transferred to a third party from the trust. This will permit a full and complete E911 Phase II implementation report to be filed by the party that will have control over KNLF236 when these new E911 requirements go into effect in 2001.

Sincerely,

Charles W. Logan

Church Key

Counsel for Joseph J. Simons, Trustee

cc: Blaise Scinto